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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and 960)

RAYMOND RODRIGUEZ,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Andrea Nurko, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about July 30, 2015, within the Eastern District of New York and elsewhere, the defendant RAYMOND RODRIGUEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:¹

1. On or about July 30, 2015, the defendant RAYMOND RODRIGUEZ, a citizen of the United States, arrived at John F. Kennedy International Airport (“JFK”) in

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Queens, New York aboard Delta Air Lines Flight 500 from Santo Domingo, Dominican Republic.

2. The defendant was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented a black Rome Executive carry-on suitcase and a blue, black, and gray Swiss Gear backpack for inspection. The defendant’s fiancée, with whom the defendant was traveling, claimed ownership of a third bag, a navy blue Skyline carry-on suitcase.

3. An examination of the navy blue Skyline suitcase belonging to the fiancé was negative. A search of the black Rome Executive suitcase belonging to the defendant was also negative. A search of the Swiss Gear backpack belonging to the defendant was then conducted. The side panels of the backpack appeared unusually thick, and a probe of the panels revealed a white powdery substance. The defendant was then taken to a private room for further examination. A CBP Officer cut open one of the side panels of the backpack, revealing a white powdery substance. The white powdery substance field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine recovered was 1,942 grams.

5. After he was placed under arrest by the CBP Officers, the defendant was read his Miranda rights, which he stated he understood and voluntarily waived. The

defendant then stated in sum and substance and in part that he knew he was carrying drugs and was paid \$5,000 to bring them to the United States.

WHEREFORE, your deponent respectfully requests that the defendant RAYMOND RODRIGUEZ be dealt with according to law.

Dated: Brooklyn, New York
July 31, 2015


ANDREA NURKO
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
31st day of July, 2015


S/ Vera Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK